

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

**Paul Tremblay, et al.**

Plaintiffs,

v.

**OpenAI, Inc., OpenAI, L.P., OpenAI OpCo.,  
L.L.C., OpenAI GP, L.L.C., OpenAI,**

Defendants.

Miscellaneous Action No. 1:25-mc-00118

Related to *OpenAI, Inc., Copyright Infringement  
Litigation*, Master File No. 1:25-md-3143, SDNY

**JOINT STATUS REPORT**

Pursuant to the Court’s Order at ECF No. 5, the Parties submit this Joint Status Report to update the Court on the status of their efforts to resolve the pending Motion to Quash (the “Motion”) (ECF No. 1).

**Status of document production.** Plaintiffs have been producing and will continue to produce documents in connection with this dispute. These future productions will be made on a rolling basis. Defendants are in the process of reviewing the documents produced to date.

**Status of the Motion.** The Parties continue to believe that the pending Motion can be resolved without further Court intervention, subject to Defendants’ ongoing evaluation of the documents produced by Plaintiffs. The Parties agree that maintaining the current stay of proceedings will facilitate resolution of the Motion and promote judicial efficiency.

**Multidistrict litigation transfer and case management.** On April 3, 2025, the Panel on Multidistrict Litigation transferred four civil actions to the United States District Court for the Southern District of New York for coordinated or consolidated pretrial proceedings pursuant to 28 U.S.C § 1407, including the action in which these subpoenas were issued, *Tremblay, et al. v. OpenAI, Inc., et al.*, Case No. 3:23-03223-AMO (N.D. Cal.). *In re: OpenAI, Inc., Copyright*

*Infringement Litig.*, MDL No. 3143 (J.P.M.L. 2025), ECF No. 85. On April 30, the transferee court ordered an Initial Conference for May 22, 2025. *In re: OpenAI, Inc., Copyright Infringement Litig.*, Case No. 1:25-md-03143-SHS-OTW (S.D.N.Y.), ECF No. 14.

**Proposed next steps.** The Parties propose filing a joint status report on or before July 21, 2025, sixty (60) days from the date of this filing, to inform the Court of the status of the Parties' efforts to reach a resolution.

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